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5 Counsel for Defendant Sanjeev Bais

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7 **UNITED STATES DISTRICT COURT**
8 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
9 **SAN JOSE DIVISION**

10 UNITED STATES,

11 Plaintiff,

12 v.

13
14 SANJEEV BAIS,

15 Defendant.

Case No. CR 13-00252 DLJ

STIPULATION AND []
ORDER TO CONTINUE STATUS
CONFERENCE AND TO EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT

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19 IT IS HEREBY STIPULATED AND AGREED between the Government, through
20 Assistant United States Attorney Thomas Moore, and Defendant Sanjeev Bais, through his
21 attorney Daniel Olmos, that the status conference presently set for October 17, 2013, be continued
22 to December 12, 2013, at 9:00 a.m. The reason for the request for continuance is that the parties
23 have engaged in discussions regarding early resolution of the case, and defense counsel has
24 agreed to provide discovery to the government which will require additional time for review.
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26 In the previous stipulation filed with this Court, the parties indicated that they planned to
27 engage in settlement discussions once defense counsel had the opportunity to review contents of
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1 the digital media seized by law enforcement from Mr. Bais. The defense has completed its initial
2 review of the media, and the parties have engaged in preliminary discussions regarding
3 settlement. However, the defense intends to provide the government with additional discovery in
4 this matter before the parties continue conferring. The parties agree that the status conference
5 should be continued in order to allow defense counsel to provide the information to the
6 government for its review.
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8 The parties agree that the time between October 17, 2013, and December 12, 2013, should
9 be excluded from calculations under the Speedy Trial Act, which excludes delay when the
10 interests of justice in allowing for the effective preparation of the defense outweigh the best
11 interest of the public and the defendant in a speedy trial, taking into account the exercise of due
12 diligence. 18 U.S.C. § 3161(h)(7).
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14 IT IS SO STIPULATED:

15 Dated: October 11, 2013

NOLAN, ARMSTRONG & BARTON LLP

18 /s/
DANIEL B. OLMOS
19 Attorney for Defendant Sanjeev Bais

20 Dated: October 11, 2013

22 /s/
THOMAS MOORE
23 Assistant United States Attorney
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6 **UNITED STATES DISTRICT COURT**
7 **FOR THE NORTHERN DISTRICT OF CALIFORNIA**
8 **SAN JOSE DIVISION**

9 UNITED STATES,

10 Plaintiff,

11 v.

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13 SANJEEV BAIS,

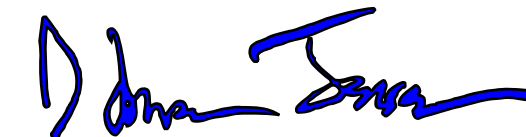
14 Defendant.
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Case No. CR 13-00252 DLJ

**☐ ORDER TO CONTINUE
STATUS CONFERENCE AND EXCLUDE
TIME UNDER THE SPEEDY TRIAL ACT**

16 GOOD CAUSE HAVING BEEN SHOWN, it is hereby ordered that the status conference
17 in this matter now scheduled for October 17, 2013, at 9:00 a.m. is hereby rescheduled for
18 December 12, 2013, at 9:00 a.m. Based upon the representation of counsel and for good cause
19 shown, the Court also finds that the time between October 17 and December 12, 2013, shall be
20 excluded from calculations under the Speedy Trial Act. The interests of justice in allowing for the
21 effective preparation of the defense and continuity of counsel outweigh the best interest of the
22 public and the defendant in a speedy trial, taking into account the exercise of due diligence. 18
23 U.S.C. § 3161(h)(7).
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26 Dated: FEB 14 2014



27 The Hon. D. Lowell Jensen
28 United States District Judge